

Message

From: Garvie, Heather [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=3ECC918109D444C19240031B3699238A-HEATHER GARVIE]
Sent: 9/9/2019 1:31:27 PM
To: McLaughlin, Jessica J [jessicamclaughlin@eastman.com]
Subject: RE: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Jessica:

Please ignore the below. I am working with another consultant with the same last name as yours and was getting matters confused. Nothing is outstanding. Thank you for sending the revised meeting minutes.

Heather

From: Garvie, Heather
Sent: Monday, September 09, 2019 6:52 AM
To: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Subject: RE: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Jessica: we were discussing the meeting minutes to ensure the PRIA code we suggested (first food) was correct. I was also out on unexpected leave for over a week due to a family emergency. I hope to get you our comments this week. Thank you for your patience.

Heather

From: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Sent: Thursday, September 05, 2019 2:00 PM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Hello Heather,

I am just following up on the finalized meeting minutes I sent to you in early August. We've placed all of the additional studies required to support our section 3 registration for chlormequat chloride. Based on previous emails from you, we will not be submitting our waiver request for the anaerobic soil metabolism study through PRIA. In your last email you state you and your team are discussing PRIA codes and will be getting back to me with a definitive answer, but I'm a little confused as to what is still outstanding. Can you please let me know? I do not want any additional hold ups.

Thank you for your help.

Jessica

From: Garvie, Heather <Garvie.Heather@epa.gov>
Sent: Thursday, August 22, 2019 6:38 AM
To: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Subject: RE: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Jessica: Just wanted to let you know that we are still looking these over. I was out on leave and only came back last week. We are discussing the PRIA codes so we can get back to you with a more definitive answer.

Thanks,

Heather

From: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Sent: Tuesday, August 06, 2019 12:15 PM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Subject: RE: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Hello Heather,

I hope you are having a good summer. I have amended the meeting minutes from our chlormequat chloride meeting on 6/4/2019 to incorporate all of the updates since the Agency has reviewed the notes. Please let me know if you agree with the minutes.

Thanks,
Jessica

From: Garvie, Heather <Garvie.Heather@epa.gov>
Sent: Wednesday, July 10, 2019 9:03 AM
To: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Subject: Re: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Hi Jessica:

Thanks for your patience.

You did not submit an anaerobic soil metabolism study (guideline 835.4200) with your application. You subsequently submitted a waiver rationale and MRID 50747529 (an anaerobic aquatic metabolism study – guideline 835.4400) to satisfy the anaerobic soil metabolism guideline. While the Agency has not done a formal review of the waiver rationale and MRID 50747529, the Agency has screened the study and determined that MRID 50747529 is scientifically valid and can be used in risk assessment as no major concerns are associated with the study. Therefore, MRID 50747529 can be cited along with your written waiver rationale for guideline 835.4200 should you decide to re-submit your package in the future. It is not necessary for you to submit a PRIA R124 (Conditional ruling on preapplication study waiver).

Please feel free to add this post-meeting email response into the minutes for the record.

Thank you,
Heather

From: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Sent: Monday, July 1, 2019 3:06 PM
To: Garvie, Heather
Subject: RE: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Hi Heather,

I have tried to leave you a few voicemails, but I keep getting cutoff. I want to follow up with you on your comment regarding the anaerobic soil metabolism study wavier. We were going to submit our waiver request through PRIA so we had certainty on the acceptability of the waiver before we resubmit our Section 3 registration next year. Based on your

comments, it seems this is not an option for us. Is this correct? This is concerning. If EPA decides our waiver is not acceptable after we submit our Section 3, we will not have time to initiate the study. We will be found to have a deficient packet and our action will be rejected. Is there any way to get clarity on this before we submit to EPA? I did not take away from our pre-submission meeting that we could not submit our scientific waiver through PRIA for review. Do you have time to discuss?

Regarding the DCI, here is a list of all of the studies outlined in the DCI for chlormequat chloride and how we intend to satisfy these data:

| DCI - Chlormequat Chloride | | |
|----------------------------|---|--|
| Guideline | Study Title | MIRD |
| 850.1400 | Fish early-life stage toxicity test | 50747506 |
| 850.2100 | Avian acute oral toxicity test | 50747507 |
| 850.2300 | Avian reproduction test - mallard | 50747508 |
| 850.2300 | Avian reproduction test - bobwhite | 50747509 |
| 850.3030 | Honey bee toxicity of residues on foliage | DCI states this is Tier I study. Taminco believes this should be a Tier II study |
| 850.3040 | Field testing for pollinators | Tier III conditional study |
| 850.4100 | Seedling Emergence and Seedling Growth | 50747514 |
| 850.4150 | Vegetative Vigor | 50747515 |
| 850.4500 | Algal Toxicity - marine diatom, Skeletonema costatum | Taminco Currently Developing Data |
| 850.4500 | Algal Toxicity - freshwater diatom, Navicula pelliculosa | Taminco Currently Developing Data |
| 850.4500 | Algal Toxicity - freshwater green alga, Pseudokirchneriella subcapitata | Taminco Currently Developing Data |
| 870.3465 | 90-day inhalation toxicity | 50747525 |
| 870.6200 | Neurotoxicity screening battery | 50182001 |
| SS-1155 | Residues in Pollen and Nectar/Field Residue Analysis | Tier II conditional study |
| SS-1313 | Honey bee adult chronic oral toxicity | 50747511 |
| SS-1317 | Honey bee larval acute oral toxicity | 50747513 |
| SS-1318 | Honey bee larval chronic oral toxicity | 50747512 |
| SS-1319 | Semi-field testing for pollinators (tunnel or colony feeding studies) | Tier II conditional study |

Please let me know if you have any questions.

Thank you,
Jessica McLaughlin

From: Garvie, Heather <Garvie.Heather@epa.gov>
Sent: Tuesday, June 25, 2019 11:31 AM
To: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Subject: [I] RE: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Hi Jessica:

Thank you for your patience. Please find our comments attached.

Let me know if you have any questions.

Heather

From: McLaughlin, Jessica J <jessicamclaughlin@eastman.com>
Sent: Thursday, June 13, 2019 7:42 PM
To: Garvie, Heather <Garvie.Heather@epa.gov>
Subject: Taminco US LLC - EPA Meeting Minutes for Chlormequat Chloride (6/4/2019)

Hello Heather,

I've prepared meeting minutes that capture all of the talking points from our June 4, 2019 chlormequat chloride meeting. The minutes also summarize your follow up email regarding the registration review of the chemical. Please let me know if you have any comments. I look forward to working with you on our future submission.

Regards,
Jessica

Jessica McLaughlin | Eastman Chemical Company
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